## REMARKS/ARGUMENT

Applicant notes the objections to the drawings/Specification as set forth in paragraphs 3-8 of the Office Action. Applicant has made a diligent effort to correct the Specification and the drawings to overcome the objections.

As to Par. 3, the reference character "206" has been changed to "216" on Fig. 2.

As to Par. 4, the reference character "133" has been deleted from the Specification on p. 8, l. 13. Since, as stated, the hang off clamp is well known, showing it on the drawings is unnecessary.

Additionally, the reference character "6302" has been deleted from p. 13, line 13 of the Specification, since the sheave, as stated, is mounted in the radius controller section "6220" and the functions of these elements is the same as in Fig. 1.

With respect to par. 6, on p. 14, l. 23, the Specification has been amended to recite that the pin is not shown rendering moot showing any pin connecting arm 6306 to the fixed structure 6300. In this regard, note that on p. 14, l. 7, it is stated that the arm 6306 is pinned "somewhere along its length."

With respect to par. 7, and specifically with reference to Claim 7, the "tensioning means" feature is described on p. 18, l. 1 to p. 19, l. 3 and Figs. 10(a) to 10(d). The description in the cited lines teaches how the tensioner 8204 and

its frame 8208 are demounted from the tiltable structure and displaced along skidways 8430.

As to Claim 8, and the recital of "range of angles either side of vertical," the Examiner's attention is directed to Fig. 10 and the discussion on p. 19, ll. 16-20, which clearly show and teach that the tiltable structure may be deployed at a range of angles in the second mode, the purpose being discussed on p. 17, ll. 27-31.

Turning to p. 7 of the Office Action, Claim 14 has been deleted rendering moot the objection to the drawings.

With respect to Claim 19, the overboarding sheave is shown in the second mode but not in the first mode in Fig. 6(a) (not shown) and Fig. 6(b) (present - (overboarding sheave 6332) which shows the second embodiment in the first and second modes, and further in Figs. 10(a)-10(f) (where the overboarding sheave 8242 is only present in Fig. 10f). Thus, the process of conversion from the first mode to the second mode is clearly shown.

As to Claim 20, it is respectfully submitted that the remarks above with respect to Claim 7 are equally applicable.

It is respectfully submitted that with respect to all the objections set forth in par. 7 of the Office Action, no new matter has been added and for reasons stated above the drawings, in all respects, comply with 37 C.F.R. 1.83(a).

Turning to par. 8 of the Office Action, and the specific reference to subpar. a, Fig. 1(a) has been modified to show the apparatus of position $200^1$ in dotted lines as suggested by the Examiner. Additionally, one of the positions of the crane shown on Fig. 1(a) has been shown in dotted lines. Further, the unidentified module to the left of Fig. 1(a) has been removed since it is now on Fig. 3. With respect to Fig. 2, a similar change has been made vis-à-vis the two positions depicted in Fig. 2. The drawing at the far left of Fig. 2 has been called out as Fig. 2(a) and the Specification amended accordingly to indicate that it is an exploded view of module 208. Further, the arrow has been deleted.

On Fig. 1(b), one of the positions of the crane 120 has been shown in dotted lines. A like change has been made to the crane 124 in Fig. 2.

As to subpar. (b) of par. 8, Fig. 3 has had the module 130 added and accordingly, removed from Fig. 2. Further, one of the positions of each of cranes 120 and 124 has been shown in dotted lines.

With respect to subpar. (e) of par. 8, the module 240 positioned at the far left hand side of Fig. 3 has been called out as Fig. 3(a), the arrow removed, and the Specification amended accordingly.

With respect to subpar. (f) of par. 8, the module (6212, 6208) positioned at the far left hand side of Fig. 6 has been designated as Fig. 6(c) and the Specification amended to recite Fig. 6(c) as an exploded view.

All of the above changes to the drawings have been made on Replacement Sheets sent herewith and it is respectfully submitted that the corrected drawings are now in compliance with 37 C.F.R. 1.121(d).

The Specification has been amended on p. 13, l. 24 to correct the typographical error as pointed out by the Examiner in par. 9 of the Office Action. The error is regretted.

The claim objections set forth in par. 10 of the Office Action have been corrected, again as suggested by the Examiner.

The 112 rejection of Claims 1-22, in connection with the phrase "overboarding means" used in Claim 12," has been rendered moot by the amendments to the claims.

Claims 1-9, 11-13 and 15-22 stand rejected as being anticipated by Willis (5975882). The rejection is respectfully traversed. Applicant respectfully submits that the Examiner's characterization of the Willis patent vis-à-vis the claimed invention is incorrect. The invention of the Willis patent is directed to laying rigid pipe, not flexible pipe. In fact, the Willis patent is discussed in the present Specification on p. 1, ll. 8-15. More specifically, the Willis patent is directed to the construction of a rigid pipeline from segments thereof on the ship, and the laying of the pipeline as it is deployed from a ramp 16. The ramp 16 is level, but is tiltable so that the pipeline enters the water at an angle which allows it to fall in a cantenary curve appropriate to the water depth (see Fig. 9 of Willis and col. 3, ll.

20-27). There is nothing in the Willis patent that teaches or suggests an overboarding means or any other overboarding mechanism for receiving flexible, elongate product from a tensioner and diverting it to a more vertical angle for deployment from the vessel. Indeed, the arrangement of Willis is not suitable in the laying of flexible pipe. There is no suggestion in the Willis patent to divert the pipeline from a vertical angle and for that matter any other angle, after it leaves tensioner 19. Although the Examiner has identified several items in Willis as "overboading means", those items have no equivalent function to overboarding. For example, the Examiner has construed overboarding means as shelter 47, pulleys 49 and roller box 63. In point of fact, shelter 47 and pulleys 49, discussed in col. 8, ll. 25-34 with reference to Fig. 8 of Willis, are directed to an arrangement downstream of a tensioner to start and stop the excursion of the pipeline if it is not on the intended track. Thus, in normal circumstances, the pipeline will not contact the roller box 63 and in any event it is not used for bending the pipeline.

As is pointed out in Applicant's Specification on p. 1, ll. 8-15, bending of the pipeline downstream of the tensioner when laying rigid pipe – as in Willis – may cause damage when there is very high tension. In this regard, not only do none of the elements identified by the Examiner in Willis as "overboarding means" perform any function to change the angle of the pipeline as would be required in flexible pipe, there is no obvious way in which these elements could

be modified for this purpose without the risk of pipeline damage and, more importantly, without the use of Applicant's disclosure. Accordingly, it is respectfully submitted that Claims 1 and 15 and hence all claims dependent thereon, are patentable over Willis.

The Stockstill patent does not cure the infirmities of the Willis patent, vis-à-vis arriving at Applicant's claimed invention. Further, nothing in '942 Willis cures the infirmities of the primary Willis patent and claims dependent thereon.

Applicant has made every effort to comply with all corrections to the Specification, the drawings and the claims as noted by the Examiner. Since those objections/rejections have been overcome, and since as pointed out above, none of the references, alone or in combination, render the claims anticipated or obvious, and it is respectfully submitted that all claims are in condition for allowance which is hereby earnestly solicited and respectfully requested.

Respectfully submitted,

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